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**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
LEED ENVIRONMENTAL, INC.**

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Telephone: (610) 670-7310
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February 10, 2000

Telecopy and First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Voluntary Progress Report 9 (January 2000)**

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during January 2000.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- During January 2000, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), temporarily demobilized field personnel and equipment from the site because of winter weather. Therefore, no activities related to remediation of residential lots, remote fill areas, or the main industrial site were performed. Through January 2000, ENTACT has completed remedial activities at 759 residential lots and 30 remote fill properties.
- During January 2000, ARCADIS Geraghty & Miller ("ARCADIS") personnel and representatives of the Group continued efforts to secure access to off-site properties associated with the implementation of the pre-design investigation for groundwater.
- On or about January 4, 2000, ARCADIS received a signed copy of an access agreement from Mr. Mark Bayley, Martin & Bailey, Inc., for installation of monitoring well GMMW-123.



- On or about January 7, 2000, the Group's project coordinator received a letter from EPA clarifying the scope of remedial activities at Slough Road. Copies of the letter were distributed by the Group's project coordinator to ENTACT personnel and Group members for consideration.
- On January 10, 2000, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, the Army Corps of Engineers ("ACOE"), ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on January 28, 2000 to document the results of the meeting.
- On January 10, 2000, the Group's project coordinator issued a voluntary progress report to EPA.
- On or about January 13, 2000, ARCADIS received a signed copy of an access agreement from the Bissell Street Warehouse Company for installation of groundwater monitoring well GMMW-117.
- On January 25, 2000, ARCADIS personnel provided access agreements to Mayor Tyrone Echols, Venice City Council, to request access for installation of groundwater monitoring wells in the right-of-way on the south side of Kerr Street (approximately 200 feet east of the intersection of Kerr Street and Main Street) and in the right-of-way on the east side of Fourth Street (approximately 100 feet south of the intersection of Fourth Street and Granville Street).
- On January 31, 2000, ENTACT provided a letter to EPA to confirm that ENTACT has temporarily demobilized field personnel and equipment from the site because of winter weather. ENTACT's letter also indicated that seven residential lots, one remote fill property, final restoration activities at the industrial site, and other remaining activities would be performed as soon as weather permits availability of sod for restoration activities.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:

- Not applicable for this reporting period.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- ARCADIS personnel will continue to prepare for field activities associated with the pre-design investigation for groundwater and will continue efforts to address EPA's comments on the Pre-Design Investigation Work Plan for Groundwater. The Group and ARCADIS will continue efforts to secure access to appropriate properties for installation of monitoring wells. The Group also anticipates that: (a) correspondence will be provided to EPA regarding the difficulties in securing access to properties for monitoring well installation; (b) a conference call will be conducted with EPA to discuss access difficulties; and (c) as soon as a sufficient number of access agreements have been executed by property owners, the Group will advise EPA with a schedule for initiation of the pre-design investigation for groundwater.
- ENTACT will complete excavation and site restoration activities at the remaining residential and remote fill lots as soon as weather conditions allow. A schedule will be provided to EPA in advance of ENTACT's remobilization to the site.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- As noted above, the Group and ARCADIS have encountered difficulties in securing access to properties for installation of monitoring wells. The Group anticipates that a conference call will be scheduled with EPA in February 2000 to discuss this situation in further detail. The current status of the Group's efforts to secure access is summarized in Table 1.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

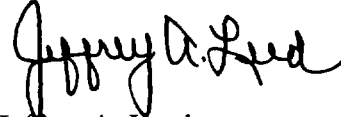
- Not applicable for this reporting period. Unless requested by EPA, no community relations activities are currently planned to be performed by the Group during the next six-week period.

Mr. Brad Bradley
February 10, 2000
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Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

attachment

cc: Mr. Bob Rogers, Illinois EPA (w/attachment, by first class mail)
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)
Mr. Nicholas Valkenburg - ARCADIS Geraghty & Miller
(w/attachment, by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(w/attachment, by first class mail)

TABLE 1
NL INDUSTRIES/TARACORP SUPERFUND SITE

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 101		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 102		✓	Off-site (east of main industrial)		Aetna Freight Lines Inc. 1501 Grand Granite City, IL 62040		Property owner recently identified. Access agreement to be prepared.
MW 103		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 103-91		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 104		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 104-92		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 105D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

February 10, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 105S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 108 D		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

February 10, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 108 S		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 109-92		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 110		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 111-92		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 108 X	✓		Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109 X	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

February 10, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 112	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
GMMW-113	✓		Main industrial (opposite side of State Street from State Street Warehouse)	22-2-19-24-15-401-006 22-2-19-24-15-401-007	John G. Obucina 1460 State Street Granite City, IL 62040	John G. Obucina 15th & State Streets Granite City, IL 62040	Access agreement issued on 12/17/99.
GMMW-113	✓						Access agreement issued to the City of Granite City in January 2000. A signed access agreement to the public right-of-way has been received from the City of Granite City.
GMMW-114	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-115	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-116	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-117	✓		Venice Township	21-1-19-25-00-000-009	Bissell Street Warehouse Co. 1226 Bissell Avenue Venice, IL 62090	Bissell Street Warehouse Co. Highway 3/P.O. Box C Madison, IL 62060	Access agreement issued on 12/17/99. Access agreement signed by Brian Kearns, Bissell Street Warehouse Co., on 12/31/99.

Table 1 (continued)
Status of Access to Properties for Predesign Investigation for Groundwater

February 10, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-118	✓		Venice Township	21-2-19-35-15-401-906.000	Gulf Mobile Ohio RR Kerr Street Venice, IL 62090	Illinois Cental RR 455 North Cityfront Plaza Dr. Chicago, IL 60611	Access agreement issued on 12/17/99.
GMMW-118	✓		Venice Township		Right-of-way on south side of Kerr Street (approx. 200 feet east of intersection of Kerr Street and Main Street)	City of Venice, City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand-delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00.
GMMW-119	✓		Venice Township	21-2-19-35-00-000-011.T00 21-2-19-35-00-000-012.T00	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Access agreement issued on 12/17/99.
GMMW-119	✓		Venice Township		Right-of-way on the east side of 4 th Street (approx. 100 feet south of intersection of 4 th Street and Granville Street)	City of Venice City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand-delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00.
GMMW-120	✓		Eagle Park Acres	21-1-19-36-08-201-004	Eagle Park Acres Imp. Assn Hill Street Madison, IL 62060	Eagle Park Acres Imp. Assn. P.O. Box 385 Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement was received from Sarah B. Page-Collins on 1/31/00. Also, ARCADIS personnel have been notified orally that Madison County Highway Department has granted access.
GMMW-121	✓		Eagle Park Acres	21-2-19-36-16-401-036	Bobby L. & Verlillian Ervin 214 Watson Street Madison, IL 62060	Bobby L. & Verlillian Ervin 212 Watson Street Madison, IL 62060	Access agreement issued on 12/17/99.
					Northern parkway of Mary Street, south of Watson Street		ARCADIS personnel notified orally that Madison County Highway Department has granted access.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

February 10, 2006

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-122	✓		Eagle Park Acres	21-2-19-36-12-202-008	Willie R. Foster Earle Street Madison, IL 62060	Willie R. Foster 306 Terry Street Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement was received on 1/28/00.
					Northwest side of Earle Street, south of Allen Street		ARCADIS personnel notified orally that Madison County Highway Department has granted access.
GMMW-123	✓		Main industrial	21-2-19-25-07-201-014	Martin and Baily, Inc. Madison Avenue Madison, IL 26060	Martin and Bailey, Inc. P.O. Box 385 Carmi, IL 62821	Access agreement issued on 12/17/99. Access agreement signed by Mark Bayley, Martin and Baily, Inc., on 12/24/99.
					Northside of 12th Street between Madison and Iowa Streets and alley between Madison and Iowa Streets, north of 12th Street, 200 feet		Access agreement hand-delivered on 1/11/00. City of Madison City Council has approved the request for access to the public right-of-way. A written agreement/permit is not required, but the building inspector must be contacted prior to drilling.
GMMW-124 GMMW-125	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access agreement issued on 12/17/99.